

January 6, 2003
To The Federal Communications Commission
Comments filed in response to **RM-10620**

At this writing more than 150 comments have been filed regarding a proposal for upgrades for certain Amateur Radio Operators without additional testing for long-held licenses in the Novice and Advanced classes. I am filing OPPOSED to non-tested upgrades for either class.

RM-10620 has been prompted by Petitioner **Dale E. Reich, K8AD**, who acknowledges in a subsequent comment filing that not everyone shall wish to "up-grade." I agree with that conclusion and use it as the basis to file in support of the preservation of the Advanced Class license, as it exists today.

Commenter **Randy Perkinson**, in a filing for RM-10620 dated December 27, 2002, notes that the license class "Advanced under old rules was more difficult to earn than Extra under current rules." It is this distinction that establishes a special value for Advanced licensees wishing to demonstrate achievement under earlier, more stringent testing standards. There no longer is such a distinction associated with holding an Extra class license, since there is no way to discern whether the holder came into the privileges under tough or easy testing.

Levels of respect among licensees can be established by operating behaviors as well as technical achievement measured by practical activity and to some extent, license testing. Length of time in the service can influence experience and competence at the goals available for us to pursue. Commenters both for and against RM-10620 widely point to these factors, so we may assume they are a recognized part of the value associated with licensure.

It is subjective to try to establish what constitutes the "worth" of a license, since the level of accomplishment it represents conveys different values to different people. That said, we continue to benefit from a decision by the Federal Communications Commission to preserve the legacy category of Advanced on behalf of the 86,000+ licensees who have chosen to retain this level of ticket.

By contrast, the Extra Class license, which previously was reserved for those who had undergone at least two years of what I call "seasoning" in underclass levels of licensing, and only after the most challenging among code testing requirements, is now available instantly at the minimum level of code proficiency.

The Petitioner makes a good point about the likely seasoning of those who've held a license for 20 years or more, but I believe the premise is backward. Instead of implementing a system linking longtime licensure to earned credit for upgrades, we instead should consider restoring a time-based prerequisite for obtaining the Extra, including initial licensing and upgrades from any legacy licenses now available only by renewal.

Such a pre-requisite would encourage mentoring by senior licensees, and protect spectrum resources against use by those who may not intend to make a long-term commitment to the expanded privileges represented by higher-class licenses. Avoiding instant-gratification may help to restore a sense of appreciation for the accomplishment our licenses represent. If the FCC chooses against acting to restore such a pre-requisite, I urge the Commission to maintain the last category of license still demonstrating at face value a higher level of challenge at obtaining the privileges associated with an upper-class ticket.

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Advanced Class License since 1973
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